

1 Stanley L. Friedman (CA SBN 120551)
2 445 South Figueroa Street, 31st Floor
3 Los Angeles, California 90071-1631
4 Telephone No. (213) 629-1500
5 Facsimile No. (213) 232-4071
6 E-mail: friedman@friedmanlaw.org

7 Attorney for Defendant
8 Scott Seo

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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DIVISION**

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 SCOTT SEO,

18 Defendant.

Case No. CR 18-625-JAK

**APPLICATION FOR LEAVE TO
FILE UNDER SEAL;
DECLARATION OF COUNSEL**

[Courtroom of The Honorable John
A. Kronstadt]

1 Scott Seo (“Defendant”) by and through his counsel, Stanley L. Friedman,
2 hereby files his Application for Leave to File Under Seal the SENTENCING
3 MEMORANDUM OF DEFENDANT SCOTT SEO; CERTIFICATION THAT
4 COUNSEL PROMPTLY PROVIDED A COPY OF THE PRESENTENCE REPORT
5 TO DEFENDANT. The basis for this Application is set forth in the Declaration of
6 counsel attached hereto.

7 This Application is unopposed. *See* Decl of Friedman.

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9 Dated: March 20, 2019.

Respectfully submitted,

10 Stanley L. Friedman
11 Stanley L. Friedman
12 Attorney for Petitioner
13 Scott Seo
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DECLARATION OF STANLEY L. FRIEDMAN

I, Stanley L. Friedman, declare as follows:

I am an attorney of record for Defendant Scott Seo. The facts stated herein are of my own personal knowledge and if called as a witness I could and would give such testimony.

1. The docket of this Honorable Court should reflect that on November 21, 2018, Defendant pled guilty pursuant to a plea agreement and that this Honorable Court set April 4, 2019, at 8:30 a.m., for date of sentencing and March 21, 2019 as the last date for the parties to file their sentencing papers.

2. Counsel for Defendant has prepared a Sentencing Memorandum which discusses personal, confidential and health-related matters and thus it is respectfully suggested to this Honorable Court that these reasons in maintaining the confidentiality of the document outweighs the public's right of access to materials submitted in connection with the sentencing of Defendant.

3. On March 18, 2019, I corresponded with Assistant United States Attorney Veronica Dragalin who had no objection to the filing of Defendant's Sentencing Memorandum under seal.

4. In the event that this Application is denied, Defendant's Counsel will file the documents in their entirety for public view and consideration by the Court.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 20th day of December, 2019.

s/ Stanley L. Friedman
Stanley L. Friedman